

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LULA WILLIAMS, <i>et al.</i>,)	
)	
Plaintiffs,)	
v.)	Civil Action No. 3:17-cv-461 (REP)
)	
BIG PICTURE LOANS, LLC, <i>et al.</i>,)	
)	
Defendants.)	
)	

MEMORANDUM IN SUPPORT OF JOINT MOTION TO EXTEND DEADLINES

Plaintiffs and the Defendant, Matt Martorello, jointly request the Court to extend all deadlines. In support thereof, the parties state as follows:

1. On January 8, 2024, this Court entered an order establishing certain deadlines with respect to Plaintiffs' Motion to Repatriate (ECF No. 1472), as well as Plaintiffs' Motion to Set Aside All Transfers and Conveyances to the Martorello 2018 Children's Trust and the RLM 2018 Trust (ECF No. 1491).

2. On January 29, 2024, the Court granted the parties' joint motion to extend the deadlines with respect to Plaintiffs' Motion to Repatriate (ECF No. 1472), as well as Plaintiffs' Motion to Set Aside All Transfers and Conveyances to the Martorello 2018 Children's Trust and the RLM 2018 Trust (ECF No. 1491). *See generally* Jan. 29, 2024 Order at Dkt. 1534. The Court granted this motion based on the parties' representations that they were working on a potential global resolution of this case, as well as the broader litigation.

3. On March 4, 2024, the parties attended an in-person settlement conference with United States Magistrate Judge Mark Colombell. At its conclusion, the parties entered into a formal

and comprehensive settlement agreement for a global resolution of this and other litigation pending in the Court, as well as other venues.

4. After the settlement conference, the parties did not immediately move for a stay because certain conditions needed to be satisfied under the terms of the settlement agreement. *See, e.g.*, Dkt. 1548. Those conditions have now been timely satisfied. Thus, the parties request the Court to stay all deadlines until any rulings on preliminary approval of the settlement.

5. Accordingly, the parties jointly request entry of the Proposed Order submitted in connection with this motion.

Respectfully submitted,
PLAINTIFFS

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